

ATTORNEYS FOR DEFENDANT FIFTH & PACIFIC COMPANIES, INC. (formerly known as LIZ CLAIBORNE)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

PATIENT CARE ASSOCIATES LLC  
a/s/o S.F.,

Plaintiff(s),

VS.

LIZ CLAIBORNE; ABC CORP. (1-10)  
(Said names being fictitious and  
unknown entities),

Defendant(s).

Civil Action No. 2:13-cv-02499

**: DEFENDANT'S RESPONSE TO**  
**: STANDING ORDER REQUIRING**  
**: SUBMISSION OF INFORMATION**  
**: REGARDING REMOVAL**

Defendant Fifth & Pacific Companies, Inc. (formerly known as Liz Claiborne)

(“Defendant”), hereby submits its response to standing order requiring submission of information regarding removal.

1. A full explanation if all Defendants served at the time of removal did not join in the notice of removal.

**RESPONSE:** Not applicable.

2. A full explanation if the notice of removal was dated more than thirty (30) days after the first Defendant was served.

**RESPONSE:** Not applicable.

3. If the action has been removed on grounds of diversity jurisdiction, a statement if any of the Defendants served at the time of removal is a citizen of the forum state.

**RESPONSE:** Not applicable.

4. If the action has been removed on grounds of diversity jurisdiction, the citizenship of Plaintiff and all named Defendants.

**RESPONSE:** Not applicable.

5. If the action has been removed on grounds of diversity jurisdiction, both parties must submit a good faith estimate of the amount in controversy with supporting documentation.

**RESPONSE:** Not applicable.

6. If the action has been removed on the basis of federal question jurisdiction, the federal statutory provision that gives rise to jurisdiction and the specific section that provides Plaintiff with a private right of action.

**RESPONSE:** Defendant removed this action based on the Employee Retirement Income Security Act. 29 USC § 1132(a)(1)(B) provides Plaintiff with a private right of action.

Respectfully submitted,

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By: s/ Carla D. Macaluso  
Carla D. Macaluso

ATTORNEYS FOR DEFENDANT

Dated: May 6, 2013  
Pleading - response to standing order.doc  
4841-4011-0611, v. 1